

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO**

---

MELODY JOY CANTU AND DR. RODRIGO  
CANTU,

5:20-CV-0746 JKP – HJB

Plaintiffs,

v.

DR. SANDRA GUERRA and DIGITAL  
FORENSICS CORPORATION, LLC,

Defendants.

---

**Continuance Request On Consent Of All Parties**

Plaintiffs Dr. Rodrigo Cantu and Melody Joy Cantu, and Co-Defendants Dr. Sandra Guerra and Digital Forensics Corporation, LLC, through their undersigned attorneys, hereby stipulate:

1. The last filed motion in this matter is Plaintiffs' Reply in Support of Their Motion to Dismiss Dr. Sandra Guerra's Amended Counterclaims.
2. The parties are currently going through discovery. Our ADR report is due February 15, 2021, along with offers of settlement from those requesting relief. On February 17, 2021 expert designations are due
3. Due to a medical emergency, Plaintiffs' counsel reached out to opposing counsel for both Co-Defendants and had a good faith conference regarding their request for a continuance.
4. All parties are in agreement and stipulate to a one-month continuance of our discovery deadlines. With the new deadlines as follows:
  - March 15, 2021: ADR Report and Offers of Settlement from Parties Requesting Relief
  - March 17, 2021: Designation of Experts by Parties Asserting Claims
  - April 1, 2021: Responses to Settlement Offers from Opposing Parties
  - April 17, 2021: Last day to Amend/Supplement Pleadings, and Joinder
  - May 2, 2021: Designation of Experts by Parties Resisting Claims
  - June 17, 2021: Discovery Deadline
  - June 31, 2021: Joint Report on Settlement Negotiations
  - July 16, 2021: Last Day to File Dispositive Motions

Dated: February 11, 2021

Stipulated and respectfully submitted,

/s/ Tor Ekeland

Tor Ekeland (NY Bar No. 4493631)  
*Pro Hac Vice*  
Tor Ekeland Law, PLLC  
30 Wall Street, 8th Floor  
New York, NY  
t: (718) 737 - 7264  
f: (718) 504 - 5417  
tor@torekeland.com

and

/s/ Rain Levy Minns

Rain Minns  
State Bar No. 24034581  
Minns Law Firm, P.C.  
d/b/a Rain Minns Law Firm  
4412 Spicewood Springs Rd., Suite 500  
Austin, Texas 78759-8583  
Tel.: 512-372-3222  
Fax: 512-861-2403  
rain@rainminnslaw.com

*Counsel for Plaintiffs Melody Joy Cantu and  
Dr. Rodrigo Cantu*

**Certificate of Service**

I certify that on this 11<sup>th</sup> of February 2021, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the parties on record.

/s/ Tor Ekeland